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REMARKS

Claim rejections under 35 USC 102

All of the pending claims have been rejected under 35 USC 102(b) as being anticipated by Luick (6,088,769). Applicant has amended independent claims 1, 2, and 8, and asserts that as amended the independent claims are no longer anticipated by Luick. Dependent claims 3-7 and 9, depending ultimately from one of these independent claims, are therefore patentable over Luick for at least the same reasons that the independent claims are.

All of the independent claims are now limited to an interconnect that *both* communicatively connects the nodes with one another *and* stores state and/or location information regarding data of the nodes. For point of reference, Applicant directs the Examiner to FIG. 3 of the patent application as filed, which shows an example of such an interconnect 70/72 that communicatively connects the nodes (quads) 58 with one another. This interconnect *also* stores state and/or location information regarding the data of the nodes (not readily apparent in FIG. 3 though). Applicant emphasis that the interconnect thus performs *two* functions *by itself*: it communicatively connects the nodes with one another, *and* stores information regarding the data of the nodes.

Luick is different than the claimed invention. It has an interconnect bus 124 (as depicted in FIG. 1 of Luick) that communicatively connects the nodes 101 with one another. However, the interconnect bus 124 does not *itself* store information regarding the data of the nodes. Rather, a *separate* global cache unit 123 (as depicted in FIG. 1 of Luick) is *also* connected to the interconnect bus 124 to store state and/or location information regarding the data of the nodes. The global cache unit 123 does not *itself* communicatively connect the nodes with one another.

The point here is that the claimed invention is directed to an interconnect that *by itself both* communicatively connects the nodes with one another, *and also* stores state and/or location information regarding the data of the nodes. That is, the claimed invention is limited to the

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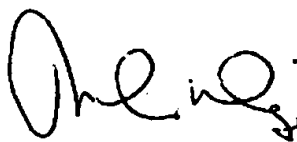Attorney docket no. BEA920000017US1

interconnect, *a single* mechanism, performing two functions.   By comparison, Luick's interconnect *just* communicatively connects the nodes with one another, and its global cache unit *just* stores state and/or location information regarding the data of the nodes.   That is, Luick discloses *two* mechanisms – an interconnect and a global cache unit – to perform all of the functionality performed by *one* mechanism in the claimed invention.

As such, Luick cannot anticipate the claimed invention.

Conclusion

Applicants have made a diligent effort to place the pending claims in condition for allowance, and request that they so be allowed.   However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Applicants' Attorney so that such issues may be resolved as expeditiously as possible.   For these reasons, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,

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Date

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